

FILED
LODGEDENTERED
RECEIVED

UNITED STATES DISTRICT COURT

SEP 16 2014

for the

Western District of Washington

AT SEATTLE
 CLERK U.S. DISTRICT COURT
 WESTERN DISTRICT OF WASHINGTON
 BY *In the Matter of Bryan* Search of
*(Briefly describe the property to be searched
 or identify the person by name and address)*

Electronic File: "Jeff Hanson Back Up" currently stored
 on SUBJECT HARD DRIVE, more fully described in
 Attachment A, attached hereto.

Case No.

MJ14-363

APPLICATION FOR A SEARCH WARRANT

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*): Electronic File: "Jeff Hanson Back Up" currently stored on SUBJECT HARD DRIVE, more fully described in Attachment A, attached hereto and incorporated herein by reference.

located in the Western District of Washington, there is now concealed (*identify the person or describe the property to be seized*):

Please see Attachment B, attached hereto and incorporated herein by reference.

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

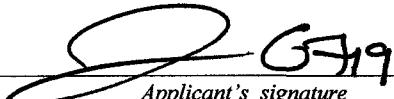
The search is related to a violation of:

Code Section
18 U.S.C. § 1204(a)

Offense Description
International Parental Kidnapping

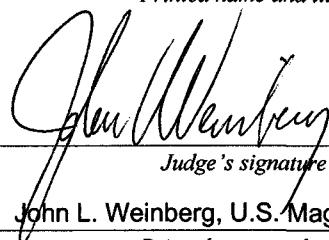
The application is based on these facts:
 Please see attached Affidavit of Detective Bryan Van Brunt, FBI TFO

- Continued on the attached sheet.
- Delayed notice of _____ days (give exact ending date if more than 30 days: _____) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.


Applicant's signature

Detective Bryan Van Brunt, FBI TFO

Printed name and title


Judge's signature

John L. Weinberg, U.S. Magistrate Judge

Printed name and title

Sworn to before me and signed in my presence.

Date: 09/16/14

City and state: Seattle, Washington

AFFIDAVIT OF BRYAN VAN BRUNT

STATE OF WASHINGTON)
)
COUNTY OF KING)

I, Bryan Van Brunt, being first duly sworn on oath, depose and say:

I. INTRODUCTION AND AGENT BACKGROUND

7 1. I am a Task Force Officer (TFO) of the Federal Bureau of Investigation
8 (FBI) and have been so since 2008. I am a Detective with the City of Seattle and have
9 been so since 2005. Prior to 2005, I was a Patrol Officer with the City of Seattle and had
10 been so since 2001. As a TFO and Detective, I have investigated and/or participated in
11 investigations, including those pertaining to narcotics, firearms, and conspiracy offenses.
12 I have acquired knowledge and information about these offenses and the various means
13 and methods by which they are executed, through formal and informal training, other law
14 enforcement officers and investigators, informants, individuals I have arrested and
15 interviewed, as well as through my participation in other investigations.

16 2. I am currently assigned to the Seattle Safe Streets Task Force (SSSTF) of
17 the Seattle Division of the FBI, which focuses on both gang-related and violent crimes. I
18 am currently authorized to investigate and enforce violations of federal criminal statutes,
19 including those found in Title 18 and 21 of the United States Code.

20 3. The facts in this affidavit come from my personal observations, my training
21 and experience, and information obtained from other agents and witnesses. I have not
22 included every fact concerning this investigation. This affidavit is intended to show
23 merely that there is a sufficient factual basis for a fair determination of probable cause to
24 support the Application.

II. APPLICABLE LAW

4. Title 18, United States Code, Section 1204 provides that it is a crime for an individual, including a parent, to remove a child from the United States, or to attempt to

1 do so, with the intent to obstruct the lawful exercise of parental rights. The term
2 "parental rights" means the right to physical custody of the child whether joint or sole,
3 and whether arising by operation of law, court order, or legally binding agreement of the
4 parties.

5 **III. STATEMENT OF PROBABLE CAUSE**

6 5. On September 12, 2014, a federal Complaint was signed by Chief United
7 States Magistrate Judge Mary Alice Theiler in the U.S. District Court for the Western
8 District of Washington alleging that Jeffrey Ford Hanson had committed the crime of
9 International Parental Kidnapping in violation of Title 18, United States Code, Section
10 1204(a). A copy of the Complaint is attached as Exhibit 1 and incorporated by reference
11 herein.

12 6. On September 12, 2014, FBI Special Agents in Seattle interviewed Leonard
13 Riojas. Riojas identified himself as JEFFREY FORD HANSON's friend, who has
14 known JEFFREY FORD HANSON for approximately two years. During the interview,
15 Riojas told Agents that JEFFREY FORD HANSON had asked him to backup up his
16 (JEFFREY FORD HANSON's) hard drive. JEFFREY FORD HANSON then gave
17 Riojas a hard drive, which Riojas imaged on Riojas's personal computer sometime in
18 September 2014. After doing so, Riojas returned JEFFREY FORD HANSON's hard
19 drive to JEFFREY FORD HANSON.

20 7. At that time, Agents asked Riojas if he would allow the FBI to image his
21 hard drive (hereinafter the "SUBJECT HARD DRIVE") to get only material pertaining to
22 JEFFREY FORD HANSON. Riojas advised that he would be amenable to assist the FBI,
23 and asked Agents to provide him with a thumb drive and he would make a copy for the
24 FBI. Agents advised Riojas, in order to preserve the integrity of the evidence and the
25 chain of custody process, it would be preferred that FBI technicians perform the
26 imaging. Riojas stated that he would prefer to do imaging himself. Agents thanked
27 Riojas for his time advised they would get back in contact with him with a solution to
28

1 | image the SUBJECT HARD DRIVE without causing too much of an inconvenience for
2 | him. At this time, the interview was discontinued.

3 | 8. Approximately 40 minutes later, members of the Safe Streets Task Force
4 | returned and advised Riojas that his consent for the FBI to take possession of the
5 | SUBJECT HARD DRIVE would assist with an investigation with an exigent
6 | circumstance. Riojas then voluntarily provided the SUBJECT HARD DRIVE to Agents.
7 | Agents then provided Riojas with a FD-597, Receipt of Property form. Riojas advised
8 | that in the SUBJECT HARD DRIVE, JEFFREY FORD HANSON's material would be
9 | titled, "Jeff Hanson Back Up." Agents then delivered the SUBJECT HARD DRIVE to
10 | FBI technicians, who made a forensic imaged of the "Jeff Hanson Back Up" materials
11 | located on the SUBJECT HARD DRIVE. The FBI began immediately searching the
12 | "Jeff Hanson Back Up" portion of the SUBJECT HARD DRIVE with the consent of the
13 | United States Attorney's Office based upon exigent circumstances.

14 | 9. Individuals I have spoken with, including practiced mariners, have
15 | informed me that individuals planning international marine travel frequently use their
16 | computers to plan such travel, including booking marina reservations, plotting travel on
17 | maps, and searching destination locations, among other things. In addition, individuals
18 | planning international travel purchase supplies to facilitate such travel. Digital receipts
19 | for, and lists of, these supplies are often kept on computers. Furthermore, as set forth in
20 | the attached Complaint, JEFFREY FORD HANSON recently contacted a number of
21 | individuals concerning his plans to leave the United States and travel internationally. In
22 | my training and experience, individuals planning travel, contact others via electronic
23 | communications, which are sent via their computers.

24 | 10. In addition, the "Jeff Hanson Back Up" Section of the SUBJECT HARD
25 | DRIVE is all potential storage media for evidence of the criminal activity. From my
26 | training and experience and the training and experience of other law enforcement officers
27 | to whom I have spoken, I believe that a computer and other digital device or storage
28 | media used in relation to a crime of this type may contain: data that is evidence of how

1 and when the computer and other digital devices was used to conduct financial
2 transactions; data that was sent to or received from financial institutions; notes as to how
3 the criminal conduct was achieved; communications between co-conspirators; and other
4 records that indicate the nature of the offense.

5 11. As described in Attachment A, this application seeks permission to search
6 for records and evidence that might be found on the "Jeff Hanson Back Up" Section of
7 the SUBJECT HARD DRIVE. One form in which the records might be found is as
8 digital data, stored on the hard drive. Thus, the warrant applied for would authorize the
9 seizure and search of the "Jeff Hanson Back Up" Section of the SUBJECT HARD
10 DRIVE or, potentially, the copying of electronically stored information, all under Rule
11 41(e)(2)(B).

12 12. *Probable cause.* I submit that if for the "Jeff Hanson Back Up" Section of
13 the SUBJECT HARD DRIVE described in Attachment A there is probable cause to
14 believe those records will be stored on that computer or storage medium, for at least the
15 following reasons:

16 a. Based on my knowledge, training, and experience and the training
17 and experience of other law enforcement personnel to whom I have spoken, I know that
18 computer files or remnants of such files can be preserved (and consequently also then
19 recovered) for months or even years after they have been downloaded onto a storage
20 medium, deleted, or accessed or viewed via the Internet. Electronic files downloaded to a
21 storage medium can be stored for years at little or no cost. Even when files have been
22 deleted, they can be recovered months or years later using forensic tools. This is so
23 because when a person "deletes" a file on a computer, the data contained in the file does
24 not actually disappear; rather, that data remains on the storage medium until it is
25 overwritten by new data.

26 b. Therefore, deleted files, or remnants of deleted files, may reside in
27 free space or slack space—that is, in space on the storage medium that is not currently
28 being used by an active file—for long periods of time before they are overwritten. In

1 addition, a computer's operating system may also keep a record of deleted data in a
2 "swap" or "recovery" file.

3 c. Wholly apart from user-generated files, computer storage media—in
4 particular, computers' internal hard drives—contain electronic evidence of how a
5 computer has been used, what it has been used for, and who has used it. To give a few
6 examples, this forensic evidence can take the form of operating system configurations,
7 artifacts from operating system or application operation, file system data structures, and
8 virtual memory "swap" or paging files. Computer users typically do not erase or delete
9 this evidence, because special software is typically required for that task. However, it is
10 technically possible to delete this information.

11 13. *Forensic evidence.* This application seeks permission to locate not only
12 computer files that might serve as direct evidence of the crimes described on the warrant,
13 but also for forensic electronic evidence that establishes how computers and other digital
14 devices were used, the purpose of their use, who used them, and when. There is probable
15 cause to believe that this forensic electronic evidence will be on any computers and
16 digital devices described in Attachment A because:

17 a. Stored data can provide evidence of a file that was once on the
18 device but has since been deleted or edited, or of a deleted portion of a file (such as a
19 paragraph that has been deleted from a word processing file). Virtual memory paging
20 systems can leave traces of information on the storage medium that show what tasks and
21 processes were recently active. Web browsers, e-mail programs, and chat programs store
22 configuration information that can reveal information such as online nicknames and
23 passwords. Operating systems can record additional information, such as the attachment
24 of peripherals, the attachment of USB flash storage devices or other external storage
25 media, and the times the computer was in use. Computer file systems can record
26 information about the dates files were created and the sequence in which they were
27 created.

1 b. Forensic evidence on a computer and other digital device or storage
2 medium can also indicate who has used or controlled the computer or storage medium.
3 This "user attribution" evidence is analogous to the search for "indicia of occupancy"
4 while executing a search warrant at a residence. For example, registry information,
5 configuration files, user profiles, e-mail, e-mail address books, "chat," instant messaging
6 logs, photographs, the presence or absence of malware, and correspondence (and the data
7 associated with the foregoing, such as file creation and last-accessed dates) may be
8 evidence of who used or controlled the computer or storage medium at a relevant time.

9 c. A person with appropriate familiarity with how a computer works
10 can, after examining this forensic evidence in its proper context, draw conclusions about
11 how computers were used, the purpose of their use, who used them, and when.

12 d. The process of identifying the exact files, blocks, registry entries,
13 logs, or other forms of forensic evidence on a computer and other digital device or
14 storage medium that are necessary to draw an accurate conclusion is a dynamic process.
15 While it is possible to specify in advance the records to be sought, digital evidence is not
16 always data that can be merely reviewed by a review team and passed along to
17 investigators. Whether data stored on a computer is evidence may depend on other
18 information stored on the computer and the application of knowledge about how a
19 computer behaves. Therefore, contextual information necessary to understand other
20 evidence also falls within the scope of the warrant.

21 e. Further, in finding evidence of how a computer was used, the
22 purpose of its use, who used it, and when, sometimes it is necessary to establish that a
23 particular thing is not present. For example, the presence or absence of counter-forensic
24 programs or anti-virus programs (and associated data) may be relevant to establishing the
25 user's intent.

26 14. *Necessity of seizing or copying entire computers or storage media.* In most
27 cases, a thorough search for information that might be stored on a computer or other
28 digital device or storage media often requires the seizure of the physical items and later

1 off-site review consistent with the warrant. In lieu of removing all of these items from
2 the premises, it is sometimes possible to make an image copy of the computer or storage
3 media, onsite. Generally speaking, imaging is the taking of a complete electronic picture
4 of the device's data, including all hidden sectors and deleted files. Either seizure or
5 imaging is often necessary to ensure the accuracy and completeness of data recorded on
6 the item, and to prevent the loss of the data either from accidental or intentional
7 destruction. This is true because of the following:

8 a. The time required for an examination. As noted above, not all
9 evidence takes the form of documents and files that can be easily viewed on site.
10 Analyzing evidence of how a computer has been used, what it has been used for, and who
11 has used it requires considerable time, and taking that much time on premises could be
12 unreasonable. As explained above, because the warrant calls for forensic electronic
13 evidence, it is exceedingly likely that it will be necessary to thoroughly examine the
14 respective device/media to obtain evidence. Computer hard drives, digital devices and
15 electronic storage media can store a large volume of information. Reviewing that
16 information for things described in the warrant can take weeks or months, depending on
17 the volume of data stored, and would be impractical and invasive to attempt on-site.

18 b. Technical requirements. Computers can be configured in several
19 different ways, featuring a variety of different operating systems, application software,
20 and configurations. Therefore, searching them sometimes requires tools or knowledge
21 that might not be present on the search site. The vast array of computer hardware and
22 software available makes it difficult to know before a search what tools or knowledge
23 will be required to analyze the system and its data on the premises. However, taking the
24 items off-site and reviewing them in a controlled environment will allow examination
25 with the proper tools and knowledge.

26 c. Variety of forms of electronic media. Records sought under this
27 warrant could be stored in a variety of storage media formats that may require off-site
28 reviewing with specialized forensic tools.

1 15. *Processing the Data*

2 a. Upon approval of the warrant, the search team will continue its
3 review of the "Jeff Hanson Back Up" Section of the SUBJECT HARD DRIVE described
4 in Attachment A that are capable of containing data or items that fall within the scope of
5 Attachment B to this Affidavit.

6 16. *Searching the Forensic Images*

7 a. Searching the forensic images for the items described in Attachment
8 B may require a range of data analysis techniques. In some cases, it is possible for agents
9 and analysts to conduct carefully targeted searches that can locate evidence without
10 requiring a time-consuming manual search through unrelated materials that may be
11 commingled with criminal evidence. In other cases, however, such techniques may not
12 yield the evidence described in the warrant, and law enforcement may need to conduct
13 more extensive searches to locate evidence that falls within the scope of the warrant. The
14 search techniques that will be used will be only those methodologies, techniques and
15 protocols as may reasonably be expected to find, identify, segregate and/or duplicate the
16 items authorized to be seized pursuant to Attachment B to this affidavit. Those
17 techniques, however, may necessarily expose many or all parts of a hard drive to human
18 inspection in order to determine whether it contains evidence described by the warrant.

19 b. These methodologies, techniques and protocols may include the use
20 of a "hash value" library to exclude normal operating system files that do not need to be
21 further searched. Agents may utilize hash values to exclude certain known files, such as
22 the operating system and other routine software, from the search results. However,
23 because the evidence I am seeking does not have particular known hash values, agents
24 will not be able to use any type of hash value library to locate the items identified in
25 Attachment C.

26 17. If, after conducting its examination, law enforcement personnel determine
27 that the "Jeff Hanson Back Up" Section of the SUBJECT HARD DRIVE is an
28 instrumentality of the criminal offenses referenced above, the government may retain that

1 device during the pendency of the case as necessary to, among other things, preserve the
2 instrumentality evidence for trial, ensure the chain of custody, and litigate the issue of
3 forfeiture.

4 18. *Past Efforts To Obtain Electronically Stored Information.* As noted above,
5 the FBI began searching the “Jeff Hanson Back Up” Section of the SUBJECT HARD
6 DRIVE on September 12, 2014, pursuant to exigent circumstances.

CONCLUSION

8 19. For the foregoing reasons, I respectfully submit that there is probable cause
9 to believe that evidence of International Parental Kidnapping, more fully described in
10 Attachment B, will be found on the "Jeff Hanson Back Up" Section of the SUBJECT
11 HARD DRIVE more fully described in Attachment A.

**BRYAN VAN BRUNT
TASK FORCE OFFICER
Federal Bureau of Investigation**

SUBSCRIBED and SWORN before me on the 6 day of September, 2014.

~~JOHN L. WEINBERG~~
~~United States Magistrate Judge~~

1 FILED
2 LODGED

1 ENTERED
2 RECEIVED

3 SEP 12 2014

4 AT SEATTLE
5 CLERK U.S. DISTRICT COURT
6 WESTERN DISTRICT OF WASHINGTON
7 DEPUTY
8 BY

The Honorable Mary Alice Theiler

7 UNITED STATES DISTRICT COURT FOR THE
8 WESTERN DISTRICT OF WASHINGTON
9 AT SEATTLE

10 UNITED STATES OF AMERICA,

11 Plaintiff,

NO. 14-*MJ-357*

12

13 v.

14 JEFFREY FORD HANSON,

15 Defendant.

16

17

18

19

20

21

22

23

24

25

26

27

28

1 COMPLAINT
2 Title 18, United States Code,
3 Section 1204

4

5 **COUNT 1**

6 **(International Parental Kidnapping)**

7 On or about September 4, 2014, and continuing to the present, within the Western
8 District of Washington, at Seattle, and elsewhere, JEFFREY FORD HANSON, did
9 knowingly remove, or attempt to remove, B.H., a child under the age of 16, from the
10 United States and did knowing retain B.H., who had been in the United States, outside
11 the United States with the intent to obstruct the lawful exercise of parental rights by the
12 mother of B.H., J.H..

13 All in violation of Title 18, United States Code, Section 1204(a).

14 U.S. v. JEFFREY FORD HANSON
15 COMPLAINT - 1

16 UNITED STATES ATTORNEY
17 700 STEWART STREET, SUITE 5220
18 SEATTLE, WASHINGTON 98101
19 (206) 553-7970

1 The undersigned complainant, Bryan Van Brunt, being duly sworn states that this
2 Complaint is based on the following information:

3 **I. INTRODUCTION AND AGENT BACKGROUND**

4 4. I am a Task Force Officer (TFO) of the Federal Bureau of Investigation
5 (FBI) and have been so since 2008. I am a Detective with the City of Seattle and have
6 been so since 2005. Prior to 2005, I was a Patrol Officer with the City of Seattle and had
7 been so since 2001. As a TFO and Detective, I have investigated and/or participated in
8 investigations, including those pertaining to narcotics, firearms, and conspiracy offenses.
9 I have acquired knowledge and information about these offenses and the various means
10 and methods by which they are executed, through formal and informal training, other law
11 enforcement officers and investigators, informants, individuals I have arrested and
12 interviewed, as well as through my participation in other investigations.

13 5. I am currently assigned to the Seattle Safe Streets Task Force (SSSTF) of
14 the Seattle Division of the FBI, which focuses on both gang-related and violent crimes. I
15 am currently authorized to investigate and enforce violations of federal criminal statutes,
16 including those found in Title 18 and 21 of the United States Code.

17 6. The facts in this affidavit come from my personal observations, my training
18 and experience, and information obtained from other agents and witnesses. I have not
19 included every fact concerning this investigation. This affidavit is intended to show
20 merely that there is a sufficient factual basis for a fair determination of probable cause for
21 this Complaint. I have set forth only the facts I believe are necessary to establish
22 probable cause to believe that JEFFREY FORD HANSON committed a violation of Title
23 18, United States Code, Section 1204(a).

24 **II. APPLICABLE LAW**

25 7. Title 18, United States Code, Section 1204 provides that it is a crime for an
26 individual, including a parent, to remove a child from the United States, or to attempt to
27 do so, with the intent to obstruct the lawful exercise of parental rights. The term
28

1 "parental rights" means the right to physical custody of the child whether joint or sole,
2 and whether arising by operation of law, court order, or legally binding agreement of the
3 parties.

4 **III. STATEMENT OF PROBABLE CAUSE**

5 8. B.H. is the son of J.H. and JEFFREY FORD HANSON, who are currently
6 divorced. B.H. and J.H. live in Hazelton, Pennsylvania. B.H. was born on August 24,
7 2005 and is 9 years old.

8 9. Pursuant to a King County (Washington) Superior Court Order, J.H. is the
9 main custodial parent of B.H. In the section of the Order entitled "Schedule for Children
10 Under School Age", the Order provides that B.H. shall reside with J.H., but gives
11 JEFFREY FORD HANSON monthly visitation rights for up to six consecutive days. In
12 another paragraph in that section, the Order reads:

13 "Other visits with mother and child can be arranged by agreement of the
14 parties. After the child reaches the age of nine, the father may travel
15 domestically or internationally for up to one year exclusively with the
child."

16 10. On July 17, 2014, B.H., with J.H.'s permission, flew to Seattle to visit with
17 JEFFREY FORD HANSON. B.H. was expected to fly back to Pennsylvania on
18 September 4, 2014, but he was not on the return flight. After he failed to return to
19 Pennsylvania, J.H. reported B.H. missing to the Hazelton Police Department. The
20 Hazelton Police Department contacted the Port of Seattle Police Department which
21 requested assistance from the FBI on September 10, 2014.

22 11. During the time B.H. was visiting JEFFREY FORD HANSON in
23 Washington State, J.H. received several text messages and phone calls from JEFFREY
24 FORD HANSON that led her to believe that JEFFREY FORD HANSON intended to not
25 return B.H. to her custody. The last time J.H. spoke with JEFFREY FORD HANSON
26 and B.H. was on August 30, 2014.

1 12. On September 10, 2014, FBI SSA Carolyn Woodbury spoke with J.H., who
2 stated that JEFFREY FORD HANSON is dangerous and has a history of alcohol abuse.
3 J.H. also said that JEFFREY FORD HANSON's friends told J.H. that JEFFREY FORD
4 HANSON is currently using methamphetamine. J.H. stated that JEFFREY FORD
5 HANSON has a history of getting into physical altercations and that she fears JEFFREY
6 FORD HANSON will harm B.H. should law enforcement get involved in B.H.'s
7 recovery.

8 13. On September 11, 2014, an FBI Safe Streets Task Force member spoke
9 with Carey Jambresic. Jambresic stated that she has known JEFFREY FORD HANSON
10 and his family, which includes JEFFREY FORD HANSON's father (Billy Sr.), and other
11 son (Chad) for over 30 years. Jambresic stated that JEFFREY FORD HANSON is
12 mentally unstable and is actively smoking crystal methamphetamine, taking oxycontin,
13 and drinking alcohol. Jambresic further stated that JEFFREY FORD HANSON, who
14 lives on a boat, has no funds and would have difficulty paying for moorage, and other
15 expendables if he did depart the Seattle, Washington area on his boat.

16 14. Jambresic said that she first heard that JEFFREY FORD HANSON did not
17 intend to return B.H. to his ex-wife in late July during a conversation with JEFFREY
18 FORD HANSON's father (Billy Sr.). During this timeframe, Jambresic assumed that
19 JEFFREY FORD HANSON was traveling with B.H. by boat to Blake Island, an island in
20 the San Juan Islands, Washington. Jambresic also reported that B.H. is unable to swim.
21 During the conversation with Billy Sr., Billy Sr. told Jambresic that JEFFREY FORD
22 HANSON made statements to the effect that he had no intent of returning B.H. to his
23 mother. Billy Sr. further confirmed that JEFFREY FORD HANSON and Billy Sr. knew
24 that JEFFREY FORD HANSON was breaking the law by not returning B.H. Because of
25 this realization, Jambresic believed that Billy Sr. would not divulge JEFFREY FORD
26 HANSON's or B.H.'s current whereabouts to law enforcement.

27 15. Jambresic stated that JEFFREY FORD HANSON's son (B.H.) had been
28 visiting his father every summer for approximately the last 5 years (in Washington State).

1 Jambresic stated that during these visits, JEFFREY FORD HANSON would both
2 physically and emotionally abuse B.H. This abuse included hitting B.H., apparently as a
3 means of attempting to "toughen" B.H. Jambresic stated that Billy Sr. was aware of this
4 treatment of his grandson but attributed it to a parenting technique with which he (Billy
5 Sr.) would not interfere.

6 16. Jambresic also reported that the last contact she and her family had with
7 JEFFREY FORD HANSON was during a violent verbal altercation with him in
8 downtown Ballard, Washington in July 2014. During this altercation, JEFFREY FORD
9 HANSON threatened to kill Jambresic's family.

10 17. On September 11, 2014, an FBI Safe Streets Task Force member contacted
11 Damen Armocido, who identified himself as a former friend of JEFFREY FORD
12 HANSON, whom he has known since high school. Armocido reported that JEFFREY
13 FORD HANSON, over the last five years, has threatened to take B.H. and that JEFFREY
14 FORD HANSON's mental capacity has been deteriorating. Armocido said that within
15 the last three months, JEFFREY FORD HANSON told him that his ex-wife "deserves
16 this." Armocido replied, "She deserves not knowing where her son is and that he is
17 missing?" JEFFREY FORD HANSON did not reply.

18 18. Additionally, during the second week of August 2014, Armocido and
19 JEFFREY FORD HANSON went shopping at Costco. During this trip, JEFFREY
20 FORD HANSON purchased extra supplies such as batteries and said that he was taking
21 B.H.

22 19. On September 11, 2014, FBI Safe Streets Task Force members contacted
23 Dawnya Robinson, who identified herself as a former friend of JEFFREY FORD
24 HANSON, whom she has known since high school. Robinson said that approximately
25 one month ago, JEFFREY FORD HANSON sent her a text message, and in the message
26 said that he was leaving the country, going to Mexico, and taking his son.

27 20. Armocido and Robinson stated that JEFFREY FORD HANSON is an
28 experienced sailor and lives on his boat. The boat registered to JEFFREY FORD

1 HANSON is a 1976 35 foot sailboat, which bears the name "Draco." It has the following
2 registration numbers WN6753NZ and WNZG03620176.

3 21. On August 28, 2014, the Hazelton Police Department called the Port of
4 Seattle Police Department, at J.H.'s request, and asked them to conduct a welfare check
5 on B.H. due to J.H. believing that JEFFREY FORD HANSON would not return B.H. to
6 her custody. Port of Seattle Police Officer Freutel responded to the Shilshole Bay Marina
7 at 7001 Seaview Avenue, NW, in Seattle, Washington where JEFFREY FORD
8 HANSON's boat was kept in slip V34.

9 22. Upon arriving at the Marina, Officer Freutel contacted JEFFREY FORD
10 HANSON and noted that JEFFREY FORD HANSON was preparing for a "journey."
11 Officer Freutel also spoke with B.H., who said that he (B.H.) wanted to stay with
12 JEFFREY FORD HANSON in order to go sailing to Blake Island, Washington.
13 JEFFREY FORD HANSON told Officer Freutel that he would contact J.H. in order to
14 ask for an extension on his visitation with B.H. so he could take them sailing. Before
15 leaving, Officer Freutel advised JEFFREY FORD HANSON that if he violated the terms
16 of the parenting plan he could be arrested for Custodial Interference 2nd degree. No
17 enforcement action was taken as JEFFREY FORD HANSON was still within his legal
18 rights to visit with B.H. at that time and B.H. seemed to be in good health.

19 23. During his initial investigation, Officer Freutel wrote an incident report in
20 which he noted that Armocido told Officer Freutel that JEFFREY FORD HANSON has
21 said, several times, that he is going to keep B.H. and not return him to his mother and just
22 sail away forever.

23 24. On September 6, 2014, the Port of Seattle Police Department, again,
24 responded to the Shilshole-Bay Marina but found that JEFFREY FORD HANSON, B.H.,
25 and the boat were missing. JEFFREY FORD HANSON's neighbor at the marina,
26 Geoffery Tyson, who uses slip V32, told the responding Port of Seattle Police Officer
27 that he had a conversation on with JEFFREY FORD HANSON on August 28th or 29th,
28

1 2014 in which JEFFREY FORD HANSON said he planned to take B.H. and sail to
2 California or Mexico.

3 25. I believe at this time that JEFFREY FORD HANSON has fled with B.H.
4 despite the existing court order and has done so by using his registered boat. While it is
5 not clear to where JEFFREY FORD HANSON is fleeing given the conflicting witness
6 accounts, his flight may involve international travel to Mexico.

7 26. On September 11, 2014, FBI Special Agents in Los Angeles interviewed
8 Vicki Horvath. Horvath identified herself as a friend of JEFFREY FORD HANSON,
9 whom she has known since high school. Horvath told investigators that in May 2014,
10 JEFFREY FORD HANSON showed up unannounced in Venice, California and stayed
11 the night at her residence. While at the residence, JEFFREY FORD HANSON began
12 consuming alcohol and repeatedly told Horvath that he is going to take his child out on
13 his boat and leave forever. On August 23, 2014, JEFFREY FORD HANSON left
14 Horvath a voicemail in which he said, "Going to go." On August 24, 2014, JEFFREY
15 FORD HANSON left Horvath another voicemail in which he said, "I'm sending you the
16 photos." Horvath said JEFFREY FORD HANSON is bitter and angry with J.H. due to
17 her having a child with another man and for leaving him (Hanson). Horvath believes that
18 JEFFREY FORD HANSON will harm B.H. in order to spite J.H.

19 27. On September 11, 2014, FBI Special Agents in Los Angeles interviewed
20 Heidi Howard. Howard identified herself as a friend of JEFFREY FORD HANSON,
21 whom she has known since high school. On August 23, 2014, Howard said that she
22 received a text message from JEFFREY FORD HANSON in which JEFFREY FORD
23 HANSON wrote that he has made enough money to keep the Draco afloat (Draco is the
24 name of Hanson's boat). In the same text message, JEFFREY FORD HANSON wrote
25 Howard,

26 "ps.grow.your.body.hair.out.you'll.need.it.for.ta.keep.you.warm.around.the.'horn...'. I
27 believe that the reference to the 'horn' in the text message is a reference to Cape Horn,
28 located at the southern tip of South America.

1 28. Howard told investigators that in August 2104, Hanson started to mail her
2 random photos he had in his possession. These pictures were of Hanson and Howard and
3 were taken when they attended high school. On August 28, 2014, Howard received a
4 mailed package from JEFFREY FORD HANSON. This package contained pictures,
5 bowties, and a book. Howard said that she believed that JEFFREY FORD HANSON
6 was parcelling out his property and that this action is indicative of someone who is going
7 to commit suicide. Howard also said that she received a mailing from JEFFREY FORD
8 HANSON four days ago. However, Howard did not open the envelope until today. On
9 the outside of the envelope was written, "Hanson the blond headed Manson." The return
10 information on the envelope was, "the little red boat on the ocean." Inside the envelope,
11 Howard found a letter that, in part, said "My poor little ex espessa J.H. will be the victim
12 y a reminder to the rest you know where the bodies are crab food." Howard also
13 corroborated Horvath's statement that JEFFREY FORD HANSON is bitter and angry.

14 29. On September 11, 2014, FBI Special Agents in Seattle interviewed Al
15 Hughes. Hughes identified himself as an associate of JEFFREY FORD HANSON and
16 his neighbor. Hughes said that he has known JEFFREY FORD HANSON for 15 to 20
17 years. Hughes told investigators that he received a text message from JEFFREY FORD
18 HANSON on August 29, 2014. In the text message, Hanson said,
19 "All.good!Cops.are.in.on.it.keys.in.the.dock.box.no.offence.ill.take.the.ging.overu.sandra
20 .locke.ps.everyone.shares.the.jaglen.can.have.the.honda.hey.you.ever..." Hughes
21 believes that this text message indicates that Hanson is giving away the Honda and that
22 he (Hanson) will not be returning for a long time.

23 30. On September 11, 2014, FBI Special Agents in Seattle interviewed Garey
24 Harr, the Shilshole-Bay Marina Dock Captain. Harr identified himself as JEFFREY
25 FORD HANSON's neighbor and said that he has known him for 3 and a half years. Harr
26 said that JEFFREY FORD HANSON recently told him that he (Hanson) was planning on
27 heading south. Harr also said that he saw JEFFREY FORD HANSON getting ready to

1 go and that JEFFREY FORD HANSON was preparing for travel by building extra
2 storage on his boat.

3 31. On September 11, 2014, FBI Special Agents in Seattle interviewed
4 Katherine Goodman, the Shilshole-Bay Marina Manager. Goodman told investigators
5 that JEFFREY FORD HANSON has not paid his moorage fees for the months of August
6 and September 2104.

7 32. On September 11, 2014, FBI SA Dean Giboney interviewed Andrea Bunch,
8 a security officer for Bank of America. Pursuant to a Grand Jury subpoena, Bunch told
9 SA Giboney that Hanson has a linked savings and checking account with Bank of
10 America. On August 18, 2014, both accounts were drawn down to near \$0 balances.
11 These withdrawals were made via debit card at the Crown Hill ATM. Bunch said that
12 \$460 was withdrawn from Hanson's saving's account and \$60 was withdrawn from
13 Hanson's checking account. Since these withdrawals there has been minimal activity on
14 either of Hanson's accounts.

15 33. Based on the aforementioned facts, I believe that JEFFREY FORD
16 HANSON has committed the crime of International Parental Kidnapping in violation of
17 Title 18, United States Code, Section 1204(a) by removing, or attempting to remove, a
18 child outside the United States with the intent to obstruct the lawful exercise of parental
19 rights.

BRYAN VAN BRUNT, Complainant
TASK FORCE OFFICER
Federal Bureau of Investigation

Based on the Complaint and Affidavit sworn to before me, and subscribed in my presence, the Court hereby finds that there is probable cause to believe JEFFREY FORD HANSON committed the offense set forth in the Complaint.

Dated: September 12, 2014

Mary Alice Theiler
MARY ALICE THEILER
Chief United States Magistrate Judge

U.S. V. JEFFREY FORD HANSON
COMPLAINT - 10

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

ATTACHMENT A

ITEMS TO BE SEARCHED

I. Electronic File: "Jeff Hanson Back Up" currently stored on SUBJECT HARD DRIVE, more fully described as: I/O Magic Hard Drive (silver and black), measuring approximately 6" x 10."

ATTACHMENT B
ITEMS TO BE SEIZED

The items to be seized are the following items or materials that may contain evidence of the commission of, the fruits of, or property which has been used as the means of committing federal criminal violations of Title 18, United States Code, Section 1204(a):

1. Any documents or any other materials reflecting any travel plans;
2. Any documents or other materials such as ledgers, receipts, notes, and similar items relating to the acquisition or transportation of any goods for use in travel;
3. Any documents or other materials concerning travel by sea, including by sailing, sailboats, and marinas.
4. Any contact lists, address books, or directories.
5. Any documents or other materials reflecting financial activity, including bank account and credit statements, withdrawals or deposits of money.
6. All data included in the memory of the hard drive, including but not limited to telephone directories, address books, emails, text messages, voice mail, electronic correspondence, and other electronic data or records which may tend to show the identity, location, purpose, plan or knowledge of any individual involved in the commission of the offense.